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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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Seattle, Washington 98101

Reply to
ATTN of:

WD-128

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RCRA PERMITS SECTION

MEMORANDUM

SUBJECT: Port of Seattle's Terminal 91 Short Fill

FROM: John Malek *Jmalek*
Dredging and Contaminated Sediments Specialist

TO: David Croxton, HW-106

The Terminal 91 Short Fill is a dredge-and-fill project in which moderately contaminated dredged material was placed between clean-fill berms. The Terminal 91 Short Fill Project was designed, completed, and monitored with the oversight of the U.S. Army Corps of Engineers, U.S. EPA Region 10, and the Washington State Department of Ecology over the period between 1984 and 1986. The fill was designed with the objective of adequately containing the contaminants present in the dredged sediments. At the time, the sediments were judged to be "contaminated" in comparison to the Fourmile Rock Interim Criteria developed and implemented at that time by EPA and the Department of Ecology. The contaminated material placed in the short fill most likely would meet today's standards for open water disposal (i.e., Puget Sound Dredged Disposal Analysis).

The agencies worked with the Port to develop the short-fill design, including a monitoring system and performance criteria, and a contingency plan outlining responses the Port would undertake if unacceptable contamination occurred. These requirements were contained in a permit from the Corps of Engineers and a consent agreement with Ecology. The monitoring was required for a 5-year time frame, which has since passed. The Port has been diligent in its continued coordination of the monitoring results with the federal and state agencies. All in all, the monitoring demonstrates that the fill has met and continues to meet the regulatory requirements of the consent agreement (*Final Project Report: Terminal 91 Short Fill Monitoring Program*, October 1992). This project, including the negotiated agreements, the design geochemical, hydrogeological, and geotechnical studies, computer modeling studies, and monitoring results has helped set standards for other nearshore confined projects in the Pacific Northwest.

In my opinion, it would be a redundant and not worthwhile use of resources for the RCRA program to investigate this unit under its corrective action authorities.

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